

DRAFT

**DRAFT
STATIONARY SOURCE PERMIT TO OPERATE**

This permit supersedes your permit dated May 10, 1976.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Padgett Manufacturing Company, Inc.
221 Old River Road
Bridgewater, Virginia 22812
Registration No.: 80930
Plant ID No.: 51-165-0108

is authorized to operate

a woodworking plant

located at

221 Old River Road
Bridgewater, Virginia

in accordance with the Conditions of this permit.

Approved on

DRAFT

Director, Department of Environmental Quality

Permit consists of 6 pages.
Permit Conditions 1 to 17.
Attachment A.

PERMIT CONDITIONS - the regulatory reference or authority for each condition is listed in parentheses () after each condition.

APPLICATION

1. Except as specified in this permit, the permitted facility is to be modified and operated as represented in the permit applications dated March 1, 1976 and March 3, 2004, including supplemental information dated March 15, 1976 and May 13, 2004. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.
(9 VAC 5-80-830)

PROCESS REQUIREMENTS

2. **Equipment List** - Equipment to be operated at this facility consists of:
 - One (1) Paasche Airbrush paint booth rated at a maximum capacity of 5.0 gallons per hour (Ref. No. 1);
 - One (1) Paasche Airbrush paint booth rated at a maximum capacity of 5.0 gallons per hour (Ref. No. 2);
 - One (1) Graco paint booth rated at a maximum capacity of 5.0 gallons per hour (Ref. No. 3);
 - A woodworking production line (Ref. No. 4) controlled by a dust collection system consisting of two Carter Day baghouses (Model Nos. 376-RF8 and 72RJ48 with a capacity of 38,000 cfm and 7,650 cfm, respectively);
 - One Johnson Heater Corporation distillate oil-fired boiler rated at 1.150 MMBtu/hr (Ref. No. 5); and
 - One Peerless Corporation distillate oil-fired boiler rated at 0.225 MMBtu/hr (Ref. No. 6).

(9 VAC 5-80-800)

OPERATING/EMISSION LIMITATIONS

3. **Emission Controls** - Particulate emissions from the woodworking production line (Ref. 4) shall be controlled by Carter Day baghouses. The baghouses shall be provided with adequate access for inspection and shall be in operation when the woodworking equipment is operating.
(9 VAC 5-80-850 and 9 VAC 5-170-160)

4. **Fuel (P2)** - The approved fuel for the boilers (Ref. Nos. 5 and 6) is distillate oil only. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-850 and 9 VAC 5-170-160)
5. **Fuel Certification (P2)** - The permittee shall obtain a certification from the fuel supplier with each shipment of distillate oil. Each fuel supplier certification shall include the following:
 - a. The name of the fuel supplier;
 - b. The date on which the distillate oil was received; and
 - c. The volume of distillate oil delivered in the shipment.
(9 VAC 5-80-850)
6. **Emission Limits (P2)** - Total volatile organic compounds (VOC) emissions from the operation of the paint booths (Ref. Nos. 1, 2 and 3) shall not exceed 21.9 tons/yr. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-850 and 9 VAC 5-170-160)
7. **Emission Limits** - Hazardous air pollutant (HAP) emissions, as defined by §112(b) of the Clean Air Act, from the facility shall not exceed 9.0 tons per year of any individual HAP or 21.9 tons per year of any combination, calculated monthly as the sum of each consecutive 12-month period. HAPs which are not accompanied by a specific CAS number [as listed in Attachment A] shall be calculated as the sum of all compounds containing the named chemical when determining compliance with the individual HAP emissions limitation of 9.0 tons per year.
(9 VAC 5-80-850)

RECORDS AND REPORTING

8. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Region. These records shall include, but are not limited to:
 - a. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content, HAP content, water content, and solids content for each coating and cleaning solution used.
 - b. Monthly and annual VOC emissions (in tons) from the paint booths (Ref. Nos. 1, 2 and 3) to verify compliance with the emissions limitation in Condition 6. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.

- c. Monthly and annual individual and total HAP emissions (in tons) from the paint booths (Ref. Nos. 1, 2 and 3) to verify compliance with the emissions limitations in Condition 7. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.
- d. All fuel supplier certifications required by Condition 5.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-900)

GENERAL CONDITIONS

- 9. **Right of Entry** - The permittee shall allow authorized local, state and federal representatives, upon the presentation of credentials:
 - a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;
 - c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations;
and
 - d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.

(9 VAC 5-170-130)

- 10. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Director, Valley Region, of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Valley Region, in writing.

(9 VAC 5-20-180 C)

11. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I)
12. **Permit Suspension/Revocation** - This permit may be suspended or revoked if the permittee:
 - a. Knowingly makes material misstatements in the application for this permit or any amendments to it;
 - b. Fails to comply with the conditions of this permit;
 - c. Fails to comply with any emission standards applicable to the equipment listed in Condition 2;
 - d. Causes emissions from this facility which result in violations of, or interferes with the attainment and maintenance of, any ambient air quality standard;
 - e. Fails to operate this facility in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect on the date that the application for this permit is submitted; or
 - f. Fails to comply with the applicable provisions of Article 6, Article 8 and Article 9 of 9 VAC 5 Chapter 80.
(9 VAC 5-80-1010)
13. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Director, Valley Region, of the change in ownership within 30 days of the transfer.
(9 VAC 5-80-940)
14. **Registration/Update** - Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact. The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.1-340 through 2.1-348 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.
(9 VAC 5-80-900)

15. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-80-860 D)

STATE-ONLY ENFORCEABLE REQUIREMENTS

This section is included pursuant to 9 VAC 5-60-300, *et. seq.*, and is not required under the federal Clean Air Act or under any of its applicable federal requirements. This section is only enforceable by the Commonwealth of Virginia State Air Pollution Control Board and its designees.

16. **Toxic Emission Limits** – Toxic emissions from the facility shall not exceed the lesser of the following:
- hourly emission limit (lb/hr) and annual emission limit (tons/yr) of each individual toxic compound as specified in Attachment A; or
 - annual emission limit of 9.0 tons per year of any individual toxic compound as specified in Condition 7 of this permit.

Average hourly emissions shall be calculated on a monthly basis. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-60-300)

17. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Region. These records shall include, but are not limited to:
- a. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content, toxic compound content, water content, and solids content for each coating and cleaning solution used.
 - b. Average hourly total combined emissions (in pounds) of each toxic compound from the paint booths (Ref. Nos. 1, 2 and 3) to verify compliance with the hourly emissions limitation in Condition 16. Hourly emissions shall be calculated monthly as an hourly average for each toxic compound (i.e., combined total of a toxic compound emitted (in pounds) for the month divided by the number of hours of operation of the paint booth for the month).
 - c. Monthly and annual individual total toxic compound emissions (in tons) from the paint booths (Ref. Nos. 1, 2 and 3) to verify compliance with the annual emissions limitation in Condition 16. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.

These records shall be available for inspection by the DEQ and shall be current for at least the most recent five years.
(9 VAC 5-80-900)